

# Exhibit D

## Megan Ix Brison

---

**From:** Elizabeth Wilburn Joyce  
**Sent:** Monday, October 17, 2022 4:41 PM  
**To:** Margaret F. England  
**Cc:** Thomas Urban; lee@fhhlaw.com; williams@fhhlaw.com  
**Subject:** RE: Discrete Holdings v. Intrado Corporation, C.A. No.: 1:21-cv-01647-CFC

Hi Margaret – pls see my in-line comments to your email below in *red italics*.

If you have any further questions, please let me know.

Thanks much,  
Elizabeth



**Elizabeth Wilburn Joyce**  
**PINCKNEY, WEIDINGER, URBAN & JOYCE LLC**  
2 Mill Road, Suite 204  
Wilmington, Delaware 19806  
Direct: (302) 504-3360  
Main: (302) 504-1497  
Fax: (302) 442-7046  
[EWilburnJoyce@pwujlaw.com](mailto:EWilburnJoyce@pwujlaw.com)  
🌐 Visit: [www.pwujlaw.com](http://www.pwujlaw.com)

## NAMWOLF A majority women-owned law firm

*This e-mail message from the law firm of Pinckney, Weidinger, Urban & Joyce LLC is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.*

---

**From:** Margaret F. England <mengland@gsbblaw.com>  
**Sent:** Thursday, October 6, 2022 8:58 AM  
**To:** Elizabeth Wilburn Joyce <EWilburnJoyce@pwujlaw.com>  
**Cc:** Thomas Urban <urban@fhhlaw.com>; lee@fhhlaw.com; williams@fhhlaw.com  
**Subject:** Re: Discrete Holdings v. Intrado Corporation, C.A. No.: 1:21-cv-01647-CFC

Elizabeth,

Thanks for taking the time to speak with us on Tuesday. Below is a brief summary of the outcome of our discussions.

Plaintiff agrees to depart from the scope of the information requested in its first requests for production of documents and the Parties agree to depart the form ESI Protocols which are in place in the District Court of the District of Delaware as follows. The Parties agree that responsive documents will be produced in searchable pdf format. I was able to confirm that there should not be an issue inserting slip sheets between any e-mails and attachments to the e-mail. The Parties reserve their right to request the metadata associated with the documents produced if deemed necessary. *EWJ: Agreed.*

During our call, we did not discuss the production format for Excel files. Please let me know if you agree that Excel files should be produced in their native format. *EWJ: Agreed.*

The date range for searches to be performed by the parties will be from June 18, 2017 through November 23, 2021, unless a particularized need for dates outside that range is established. *EWJ: I think you mean 06/28/2017 (which is one year prior to the date of the SPA) to date of Complaint? Agreed.*

Additionally, we discussed the need for a confidentiality order to be entered in this matter. It is Plaintiff's preference to have a two-tiered order entered at the outset so it is in place if needed. During the call, you indicated that you would discuss with your client whether it would agree to the entry of a two-tiered order. Once we get your response, we will circulate a draft order for your review. *EWJ: Agreed, please send the draft over.*

Finally, we mentioned that we anticipate taking a Rule 30(b)(6) deposition and the depositions of certain individuals disclosed by your client in its initial disclosures sometime in November or December. You will let us know whether we should contact Megan regarding scheduling or if you will be handling the depositions. *EWJ: We think this is unnecessarily expedited given the Scheduling Order in the case. Our office first reached out to you all in July to schedule the meet & confer, and you did not respond until the end of September, over 8 weeks after we raised the issue. The schedule provides for a year-end document production deadline and the full month of January 2023 to complete discovery. This supports allowing all documents to be produced before commencing depositions to avoid having to recall any witnesses. This case is not expedited and SJ motions are not contemplated to be filed without leave of court until June 1, 2023, or 10 days prior to that date at the earliest. We are happy to work collaboratively to get witnesses locked down for dates to be deposed in January, 2023.*

If you have any issues with the summary outlined above, please let me know.

Thanks,

Margaret

---

**From:** Elizabeth Wilburn Joyce <[EWilburnJoyce@pwujlaw.com](mailto:EWilburnJoyce@pwujlaw.com)>  
**Date:** Thursday, September 29, 2022 at 1:33 PM  
**To:** Margaret F. England <[mengland@gsbblaw.com](mailto:mengland@gsbblaw.com)>  
**Subject:** RE: Discrete Holdings v. Intrado Corporation, C.A. No.: 1:21-cv-01647-CFC

Ok thanks

---

**From:** Margaret F. England <[mengland@gsbblaw.com](mailto:mengland@gsbblaw.com)>  
**Sent:** Thursday, September 29, 2022 11:27 AM  
**To:** Elizabeth Wilburn Joyce <[EWilburnJoyce@pwujlaw.com](mailto:EWilburnJoyce@pwujlaw.com)>  
**Cc:** [lee@fhhlaw.com](mailto:lee@fhhlaw.com); Thomas Urban <[urban@fhhlaw.com](mailto:urban@fhhlaw.com)>; [williams@fhhlaw.com](mailto:williams@fhhlaw.com)  
**Subject:** Re: Discrete Holdings v. Intrado Corporation, C.A. No.: 1:21-cv-01647-CFC

Let's plan on 2:00. I will send around a dial-in shortly.

Margaret

---

**From:** Elizabeth Wilburn Joyce <[EWilburnJoyce@pwujlaw.com](mailto:EWilburnJoyce@pwujlaw.com)>  
**Date:** Wednesday, September 28, 2022 at 11:14 AM